

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

OCT -4 PM 2:50

UNITED STATES OF AMERICA

v.

SERHAT GUMRUKCU,  
BERK ERATAY, and  
JERRY BANKS,  
Defendants.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

CLERK  
BY AL  
DEPUTY CLERK

No. 5:22-cr-58

SUPERSEDING INDICTMENT

The grand jury charges:

Count One

Between in or about May 2017 and in or about February 2018, within the District of Vermont and elsewhere, the defendants, SERHAT GUMRUKCU, BERK ERATAY and JERRY BANKS, together and with others, knowingly and intentionally conspired to cause JERRY BANKS to travel in interstate commerce, and to use and cause another to use facilities of interstate commerce, namely cellular telephone networks and financial wires, with intent that the murder of Gregory Davis be committed, in violation of 13 V.S.A. § 2301, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, and the death of Gregory Davis resulted.

(18 U.S.C. § 1958)

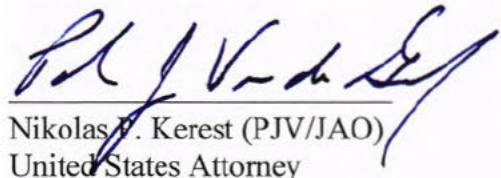
Count Two

On or about January 6, 2018, in the District of Vermont, the defendant, JERRY BANKS, unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away for reward and otherwise Gregory Davis, when JERRY BANKS travelled in interstate commerce and used a facility or instrumentality of interstate commerce in committing and in furtherance of the commission of the offense, and the death of Gregory Davis resulted.

(18 U.S.C. § 1201)

A TRUE BILL

  
FOREPERSON  


  
Nikolas P. Kerest (PJV/JAO)  
United States Attorney  
Burlington, Vermont  
October 4, 2022